



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, D.C. 20460

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OFFICE OF CHEMICAL SAFETY AND
POLLUTION PREVENTION

Mr. Murray Schiffman
160 Middle Neck Road, Apt. 6D
Great Neck, New York 11021

Dear Mr. Schiffman:

Thank you for your July 26, 2019, letter to the U.S. Environmental Protection Agency (EPA) regarding chlorpyrifos. We understand your concerns.

As the agency pursues its mission to protect human health, including that of children, and the environment, EPA is committed to ensuring that registered pesticides do not cause unreasonable adverse effects on human health and the environment. The agency is dedicated to helping support and protect farmworkers and their families while making certain that pesticides are used appropriately among the nation's agriculture. EPA will continue to use sound science in the decision-making process under federal pesticide laws.

In March 2017, EPA denied a 2007 petition filed by the Pesticide Action Network North America (PANNA) and the Natural Resources Defense Council (NRDC) that asked us to revoke all pesticide tolerances (maximum residue levels in food) for chlorpyrifos and cancel all chlorpyrifos registrations. EPA concluded that despite several years of study, the science addressing neurodevelopmental effects remains unresolved and further evaluation of the science during the remaining time for completion of registration review is warranted. In June 2017, the petitioners and others filed their objections.

Upon the agency denying all objections to the denial of the 2007 petition on chlorpyrifos in July 2019, the petitioners filed suit in August 2019 to review orders issued by EPA denying the 2007 petition. The United States Court of Appeals for the Ninth Circuit issued its decision for this petition on April 29, 2021, which may be found here: [[HYPERLINK](https://cdn.ca9.uscourts.gov/datastore/opinions/2021/04/29/19-71979.pdf)

"<https://cdn.ca9.uscourts.gov/datastore/opinions/2021/04/29/19-71979.pdf>"]. EPA is determining the next steps in compliance with the Court's April 29th decision, while continuing to work toward completing the registration review of chlorpyrifos.

Under the Federal Insecticide, Fungicide and Rodenticide Act (FIFRA), EPA is required to review registered pesticides periodically to determine if they continue to meet the standards for registration. To do that here, EPA has undertaken considerable efforts to assess the available chlorpyrifos data.

In September 2020, EPA issued the draft ecological risk assessment and another revised human health risk assessment for chlorpyrifos. The chlorpyrifos proposed interim decision was issued in December of 2020 and includes proposed mitigation measures for potential risks identified in the most recent draft risk assessments. These documents may be found in the public docket at www.regulations.gov at: [

Internet Address (URL) : [[HYPERLINK "http://www.epa.gov/" \h](http://www.epa.gov/)]

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HYPERLINK "<https://www.regulations.gov/docket/EPA-HQ-OPP-2008-0850/document>"].

In response to requests from the public, EPA is expediting the review of chlorpyrifos, which should be completed before the 2022 statutory deadline. Registration review is a comprehensive, scientific and transparent process that will further evaluate the potential effects of chlorpyrifos.

In addition, EPA sought peer review by the September 2020 FIFRA Scientific Advisory Panel (SAP) of a New Approach Methodology (NAM). This peer review may provide additional insight into EPA's evaluation of the neurodevelopmental toxicity potential of chlorpyrifos. The SAP report on the NAM was issued in December 2020 and is currently under review. The report and additional information on the SAP may be found here: [HYPERLINK "<https://www.epa.gov/sap/use-new-approach-methodologies-nams-derive-extrapolation-factors-and-evaluate-developmental>"]. More information about chlorpyrifos may be found at [HYPERLINK "<file:///C:/Users/ddinkins/AppData/Local/Microsoft/Windows/INetCache/Content.Outlook/IY79LDOV/www.epa.gov/ingredients-used-pesticide-products/chlorpyrifos>"].

Again, thank you for your letter. EPA cannot succeed in meeting its mission without input from concerned citizens like you. We look forward to working together to continue to protect human health and the environment.

Best,

[HYPERLINK "<https://www.epa.gov/aboutepa/about-office-chemical-safety-and-pollution-prevention-ocspp>" \t "_blank" \o "<https://www.epa.gov/aboutepa/about-office-chemical-safety-and-pollution-prevention-ocspp>"]
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